

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MARY FEENEY,	)	
	)	Civil Action 1:15-cv-08022
Plaintiff,	)	
	)	Honorable Charles R. Norgle
v.	)	Judge Presiding
	)	
	)	Honorable Maria Valdez
SETERUS, INC.	)	Magistrate Judge
	)	
Defendant.	)	

**SETERUS’S UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO RESPOND TO COMPLAINT**

Defendant Seterus, Inc. (“Seterus”), by its attorneys, moves unopposed pursuant to Fed. R. Civ. P. 6(b) for an extension of the time allowed for Seterus to answer or otherwise plead to the complaint in this action, for the reasons that follow:

1. Plaintiff Mary Feeney (“Plaintiff”) served Seterus with her Complaint in this matter (“Complaint”) on October 19, 2015.

2. Seterus’s response to the Complaint is currently due on or before December 2, 2015. [DE 10].

3. In her Complaint, Plaintiff alleges supposed violations of the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq. (“FDCPA”), violation of the bankruptcy discharge injunction pursuant to 11 U.S.C. § 524, and violation of the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/1, et seq. (“ICFA”). [D.E. 1 at ¶ 1].

4. Counsel for the Seterus requires additional time to complete its investigation the factual allegations in this matter, and to prepare an appropriate response to Plaintiff’s Complaint.

5. Thus, good cause exists for the extension sought herein.

6. This motion is not interposed for the purposes of harassment or delay.

7. No party would be unduly prejudiced if this Court grants Seterus an extension of time to enable Seterus to appropriately respond to the Complaint.

8. Counsel for Seterus contacted counsel for Plaintiff, who advised that Plaintiff has no objection to the request for an extension of time to respond to the Complaint, up to and including December 18, 2015.

9. Accordingly, Seterus respectfully requests an extension of time, up to and including December 18, 2015, to answer or otherwise plead.

WHEREFORE, Seterus respectfully requests that that the Court grant its unopposed motion, and allow them an extension of time in which to file their responses to the Complaint up to and including December 18, 2015, and that the Court provide such further relief as it deems just and proper.

Date: December 1, 2015

Respectfully submitted,

**SETERUS, INC.,**

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By: /s/ Charles J. Ochab  
One of Its Attorneys

### **Certificate of Service**

I, Charles J. Ochab, an attorney, hereby certify that on **December 1, 2015**, service of a true and correct copy of this document and any referenced exhibits was accomplished pursuant to ECF on all parties who are Filing Users.

/s/ Charles J. Ochab